

**Department of Labor
Occupational Safety and Health Administration
Final Supporting Statement**

**SUPPORTING STATEMENT FOR THE INFORMATION COLLECTION
REQUIREMENTS IN THE SHIPYARD EMPLOYMENT STANDARDS
(29 CFR part 1915, subparts G and K)¹
OFFICE OF MANAGEMENT AND BUDGET (OMB)
CONTROL NO. 1218-0220 (March 2015)**

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The main objective of the Occupational Safety and Health Act of 1970 (i.e., “the Act”) is to “assure so far as possible every working man and woman in the Nation safe and healthful working conditions and to preserve our human resources” (29 U.S.C. 651). To achieve this objective, the Act authorizes “the development and promulgation of occupational safety and health standards” (29 U.S.C. 651).

With regard to recordkeeping, the Act specifies that “[e]ach employer shall make, keep and preserve, and make available to the Secretary . . . such records . . . as the Secretary . . . may prescribe by regulation as necessary or appropriate for the enforcement of this Act . . .” (29 U.S.C. 657). The Act states further that “[t]he Secretary . . . shall . . . prescribe such rules and regulations as [he/she] may deem necessary to carry out [his/her] responsibilities under this Act, including rules and regulations dealing with the inspection of an employer’s establishment” (29 U.S.C. 657).

Under the authority granted by the Act, the Occupational Safety and Health Administration (i.e., “OSHA” or “the Agency”) published standards for the shipyard employment industry regulating manila rope and manila rope slings (29 CFR 1915.112(a)(1)), wire rope and wire rope slings (29 CFR 1915.112(b)(1)), chain and chain slings (29 CFR 1915.112(c)(1)), hooks and shackles (29 CFR 1915.113(b)(1)) and portable air receivers and other unfired pressure vessels (29 CFR 1915.172(d)) in shipyards (i.e., “the Standards”). The paperwork provisions of the Standards specify requirements for developing and maintaining records of tests. Items 2 and 12 below describe in detail the specific information collection requirements of the Standards.

¹The purpose of this Supporting Statement is to analyze and describe the burden hours and costs associated with provisions of this Standard that contain paperwork requirements; this Supporting Statement does not provide information or guidance on how to comply with, or how to enforce, these provisions.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the Agency has made of the information received from the current collection.

The following sections describe who uses the information collected under each requirement, as well as how they use it. The purpose of these requirements is to reduce employees' risk of death or serious injury by ensuring that equipment has been tested and is in safe operating condition.

§1915.112 Ropes, chains, and slings:

Manila rope and manila-rope slings (paragraph (a)(1)). The employer must ensure that manila rope and manila-rope slings have permanently affixed and legible identification markings as prescribed by the manufacturer that indicate the recommended safe working load for the type(s) of hitch(es) used, the angle upon which it is based, and the number of legs if more than one.

Wire rope and wire-rope slings (paragraph (b)(1)). The employer must ensure that wire rope and wire-rope slings have permanently affixed and legible identification markings as prescribed by the manufacturer that indicate the recommended safe working load for the type(s) of hitch(es) used, the angle upon which it is based, and the number of legs if more than one.

Chain and chain slings (paragraph (c)(1)). The employer must ensure that chain and chain slings have permanently affixed and legible identification markings as prescribed by the manufacturer that indicate the recommended safe working load for the type(s) of hitch(es) used, the angle upon which it is based, and the number of legs if more than one.

Chain and chain slings (paragraph 1915.112(c)(2)). – the employer shall visually inspect all sling chains, including end fastenings, before being used on the job, as well as every 3 months. The inspection shall include inspection for wear, defective welds, deformation and increase in length or stretch. Each chain shall bear an indication of the month in which it was thoroughly inspected.

§1915.113 Shackles and hooks:

Shackles (paragraph (a)(1)). The employer must ensure that shackles have permanently affixed and legible identification markings as prescribed by the manufacturer that indicate the recommended safe working load

Test Records for Hooks (paragraph (b)(1)). This paragraph requires that the manufacturer's recommendations be followed in determining the safe working loads of the various sizes and types of hooks. If the manufacturer's recommendations are not available, the hook must be tested to twice the intended safe working load before it is initially put into use. The employer must maintain and keep readily available a certification record which includes the date of such test, the signature of the person who performed the test, and the identifier for the hook which was tested.

The records are used to assure that equipment has been properly tested. The records also provide the most efficient means for the compliance officers to determine that an employer is complying with the Standard.

§1915.115 Hoisting and Hauling Equipment:

Mobile Crawler or Truck Cranes Used on a Vessel (paragraph 1915.115(c)) – This paragraph requires that the maximum manufacturer's rated safe working loads for the various working radii of the boom and the maximum and minimum radii at which the boom may be safely used with and without outriggers shall be conspicuously posted near the controls and shall be visible to the operator.

§1915.172 Portable air receivers and other unfired pressure vessels.

Examination and Test Records for Unfired Pressure Vessels (paragraph (d)). This paragraph requires that portable, unfired pressure vessels not built to the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section VIII, Rules for Construction of Unfired Pressure Vessels, 1963 be examined quarterly by a competent person and subjected to a yearly hydrostatic pressure test. A certification record of such examinations and tests shall be maintained.

The records are used to assure that equipment has been properly tested. The records also provide the most efficient means for OSHA compliance officers to determine that an employer is complying with the Standard. OSHA does not believe that there are any unfired pressure vessels not built to the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section VIII, Rules for Construction of Unfired Pressure Vessels, 1963 currently in use. However, for purposes of completing this ICR, the Agency is calculating burden hours and costs for this provision.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Employers may use automated, electronic, mechanical, or other technological information-collection techniques, or other forms of information technology (e.g., electronic submission of responses) when establishing and maintaining the required records. The Agency wrote the paperwork requirements of the Standard in performance-oriented language (i.e., in terms of what data to collect, not how to record the data).

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in A.2 above.

The requirements to collect and maintain information are specific to each employer and employee involved, and no other source or agency duplicates these requirements or can make the

required information available to OSHA (i.e., the required information is available only from employers).

5. If the collection of information impacts small businesses or other small entities, describe the methods used to reduce the burden.

The information collection requirements specified by the Standards do not have a significant impact on a substantial number of small entities.

6. Describe the consequence to Federal program or policy activities if the collection is or is not conducted less frequently, and any technical or legal obstacles to reducing the burden.

The Agency believes that the information collection frequencies required by the Standards are the minimum frequencies necessary to effectively regulate equipment, and thereby fulfill its mandate “to assure so far as possible every working man and woman in the Nation safe and healthful working conditions and to preserve our human resources” as specified in the Act at 29 U.S.C. 651. Accordingly, if employers do not perform the required information collections, or delay in providing this information, employees may inadvertently use equipment that is unsafe to use, thus increasing their risk of death and serious injury.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **Requiring respondents to report information to the agency more often than quarterly;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **In connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can prove that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

No special circumstances exist that require employers to collect information using the procedures specified by this item. The requirements are within the guidelines set forth in 5 CFR 1320.5.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection before submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to those comments specifically address comments received on cost and hour burdens.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, revealed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that mitigate against consultation in a specific situation. These circumstances should be explained.

As required by the Paperwork Reduction Act of 1995 (44 U.S.C. 3506(c)(2)(A)), OSHA published a notice in the Federal Register on November 13, 2014 (79 FR 67465) requesting public comment on its proposal to extend the Office of Management and Budget's (OMB) approval of the information collection requirements contained in its Shipyard Employment Standards ("the Standard"; Docket No. OSHA-2011-0190). This notice was part of a preclearance consultation program intended to provide those interested parties with an opportunity to comment on OSHA's request for an extension by the Office of Management and Budget (OMB) of a previous approval of the information collection requirements found in the above Standard.

The Agency received one comment in response to this notice from Anthony Bryant, Bryant Group, Inc., Docket number OSHA-2011-0190-0007 on November 17, 2014.

Mr. Bryant did not comment on specific aspects of the Standard or any aspects of the collection of information requirements contained in the Standards. In his comment, Mr. Bryant focuses more on how OSHA can prevent accidents and illnesses in the workforce due to unsafe working conditions. This comment does not have any impact on the collection of information requirements contained in the 29 CFR 1915 Standards. Therefore, the Agency will retain its burden hour and cost estimates.

9. Explain any decision to provide any payments or gift to respondents, other than reenumeration of contractors or grantees.

The Agency will not provide payments or gifts to the respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The paperwork requirements specified by the Standards do not involve confidential information.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

None of the provisions in the Standards require sensitive information.

12. Provide estimates of the hour burden of the collection of information. The statement should:

Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage-rate categories.

Burden-Hour and Cost Determinations

Estimating the number of shipyard firms and establishments, shipyard employers, and shipyard employees

The number of shipyard firms and establishments, shipyard employers and shipyard employees used in this ICR are based on the Final Economic Analysis for the final rule revising subpart F of 29 CFR part 1915 prepared by OSHA's Office of Regulatory Analysis. The Agency estimates that there are 2,759 establishments affected by this ICR.

Wage Rates

The wage rates below, which include benefits, are based on those used in the FEA². OSHA inflated the wage rate from the FEA to 2011 based on the change in total annual payroll per employee.

o Supervisors (\$38.50 per hour for shipyards, \$48.08 per hour for water transportation, \$35.91 per hour for fish processing, \$20.35 per hour for commercial fishing)

² https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=FEDERAL_REGISTER&p_id=22043

- o Authorized Employees (\$27.69 per hour for shipyards, \$50.62 per hour for water transportation, \$34.03 per hour for fish processing, \$16.29 per hour for commercial fishing)
- o Affected Employees (\$22.78 per hour per hour for shipbuilding and repair establishments; \$33.32 for water transportation, \$19.37 per hour for fish-processing vessels, and \$16.29 per hour for commercial fishing)
- o Secretary (\$19.62 per hour)

(A) Slings in Shipyards and Non-Shipyards Industries:

Identification of Safe Working Loads Under Paragraphs 1915.112(a) and (b)

Shipyards:

Manila rope and manila-rope slings (paragraph 1915.112 (a)(1)) -- The employer must ensure that manila-rope and manila rope slings have permanently affixed and legible identification markings as prescribed by the manufacturer that indicate the recommended safe working load for the type(s) of hitch(es) used, the angle upon which it is based, and the number of legs if more than one.

On average, OSHA estimates that there are 4 slings per shipyard in use and that there are 639 establishments affected in shipyard employment (4 slings/shipyard x 639 establishments = 2,556 slings). The Agency estimates that 1% of the shackles will be required to have the labels replaced in accordance with the manufacturer's specifications. OSHA estimates that it will take 30 minutes (0.5 hour) for a shipyard worker to acquire and affix the label according to the manufacturer's specifications.

Burden hours: 2,556 slings x 1% slings to be repaired x .5 hour = 13 hours

Cost: 13 hours x \$22.78= \$296

Wire rope and wire-rope slings (paragraph 1915.112 (b)(1)) -- The employer must ensure that wire rope and wire-rope slings have permanently affixed and legible identification markings as prescribed by the manufacturer that indicate the recommended safe working load for the type(s) of hitch(es) used, the angle upon which it is based, and the number of legs if more than one.

On average, OSHA estimates that there are 4 slings per shipyard in use and that there are 639 establishments affected in shipyard employment (4 slings/shipyard x 639 establishments = 2,556 slings). It is estimated that only 1% of the shackles will need to the labels replaced in accordance with the manufacturer's specifications. It is estimated to take 30 minutes (0.5 hours) for a shipyard worker to acquire and affix the label according to manufacturer's specifications.

Burden hours: 2,556 slings x 1% slings to be repaired x .5 hour = 13 hours
Cost: 13 hours x \$22.78 = \$296

Chain and chain slings (paragraph 1915.112 (c)(1)) -- The employer must ensure that chain and chain slings have permanently affixed and legible identification markings as prescribed by the manufacturer that indicate the recommended safe working load for the type(s) of hitch(es) used, the angle upon which it is based, and the number of legs if more than one.

On average, OSHA estimates that there are 4 slings per shipyard in use and that there are 639 establishments affected in shipyard employment (4 slings/shipyard x 639 establishments = 2,556 slings). The Agency estimates that 1% of the slings will need to have the labels replaced according to the manufacturer’s specifications. OSHA estimates that it will take a shipyard worker 30 minutes (0.5 hours) to acquire and affix the label according to manufacturer’s specifications.

Burden hours: 2,556 slings x 1% slings to be repaired x .5 hour = 13 hours
Cost: 13 hours x \$22.78 = \$296

Table 1 -- Summary of Burden Hours and Cost in the Shipyard Industries

Type of Sling Shipyard	Affected Establishments	Slings	Percent Repaired	Time to Repair	Total Hours	Affected Employee	Cost
Manila	639	2,556	1%	0.5 hours	13	\$22.78	\$296
Wire Rope	639	2,556	1%	0.5 hours	13	\$22.78	\$296
Chain	639	2,556	1%	0.5 hours	13	\$22.78	\$296
Total					39		\$888

Non-Shipyards:

On average, OSHA estimates that only one third of establishments will require slings in use for commercial fishing and that there are 1,141 establishments affected in shipyard employment (1/3 x 1,141 establishments = 380 slings). The Agency estimates that 1% of the shackles will be required to have the labels replaced in accordance with the manufacturer’s specifications. OSHA estimates that it will take 30 minutes (0.5 hour) for a shipyard worker to acquire and affix the label according to the manufacturer’s specifications.

Burden hours: 380 slings x 1% slings to be repaired x .5 hour = 2 hours
Cost: 2 hours x \$16.29= \$33

On average, OSHA estimates that only one third of establishments will require slings in use for fish processing and that there are 214 establishments affected in shipyard employment ($1/3 \times 214$ establishments = 71 slings). The Agency estimates that 1% of the shackles will be required to have the labels replaced in accordance with the manufacturer's specifications. OSHA estimates that it will take 30 minutes (0.5 hour) for a shipyard worker to acquire and affix the label according to the manufacturer's specifications.

Burden hours: 71 slings x 1% slings to be repaired x .5 hour = 1 hour (rounded up)

Cost: 1 hour x \$19.37 = \$19

On average, OSHA estimates that only one third of establishments will require slings in use for tug and towing service and that there are 639 establishments affected in shipyard employment ($1/3 \times 639$ establishments = 213 slings). The Agency estimates that 1% of the shackles will be required to have the labels replaced in accordance with the manufacturer's specifications. OSHA estimates that it will take 30 minutes (0.5 hour) for a shipyard worker to acquire and affix the label according to the manufacturer's specifications.

Burden hours: 213 slings x 1% slings to be repaired x .5 hour = 1 hour

Cost: 1 hour x \$33.32 = \$33

On average, OSHA estimates that only one third of establishments will require slings in use for passenger vessels and that there are 126 establishments affected in shipyard employment ($1/3 \times 126$ establishments = 42 slings). The Agency estimates that 1% of the shackles will be required to have the labels replaced in accordance with the manufacturer's specifications. OSHA estimates that it will take 30 minutes (0.5 hour) for a shipyard worker to acquire and affix the label according to the manufacturer's specifications.

Burden hours: 42 slings x 1% slings to be repaired x .5 hour = 1 hour (rounded up)

Cost: 1 hour x \$33.32 = \$33

Table 2 --- Summary Burden Hours and Cost in the Non-Shipyard Industries for Slings

Industry	Affected Establishments	Slings	Percent Repaired	Time to Repair	Total Hours	Affected Employee Wages	Cost
Commercial Fishing	1,141	380	1%	0.5 hour	2	\$16.29	\$33
Fish Processing	214	71	1%	0.5 hour	1	\$19.37	\$19
Tug & Towing Services	639	213	1%	0.5 hour	1	\$33.32	\$33
Passenger Vessels	126	42	1%	0.5 hour	1	\$33.32	\$33
Total					5		\$118

Sling Inspections Under Paragraph 1915.112(c):

Shipyards:

Chain and chain slings (paragraph 1915.112(c)(2)) – In paragraph 1915.112(c)(2), the employer must visually inspect all sling chains, including end fastenings, before being used on the job, as well as every 3 months. The inspection shall include inspection for wear, defective welds, deformation and increase in length or stretch. Each chain shall bear an indication of the month in which it was thoroughly inspected.

On average, OSHA estimates that there are 4 slings per shipyard in use and that there are 639 establishments affected in shipyard employment. (4 slings/shipyard x 639 establishments = 2,556 slings). All sling chains in use must be inspected and labeled with the date of inspection, which has been estimated to take 30 minutes (0.5 hours) for a shipyard authorized employee to inspect each sling and affix a label containing the date of inspection.

Burden hours: 2,556 slings x 4 inspections/ year x .5 hour = 5,112 hours

Cost: 5,112 hours x \$27.69 = \$141,551

Non-Shipyards:

OSHA estimates additional man hours and cost associated with the inspection and application of the date of inspection, four times annually, for the number of chain slings used by the above estimated establishments for commercial fishing. On average, it will take approximately 30 minutes (0.5 hour) for an authorized worker to inspect and affix a label indicating the date of inspection.

Burden hours: 380 slings x 4 inspections/ year x .5 hour = 760 hours

Cost: 760 hours x \$16.29 = \$12,380

OSHA estimates additional man hours and cost associated with the inspection and application of the date of inspection, four times annually, for the number of chain slings used by the above estimated establishments for fish processing. On average, it will take approximately 30 minutes (0.5 hour) for an authorized worker to inspect and affix a label indicating the date of inspection.

Burden hours: 71 slings x 4 inspections/ year x .5 hour = 142 hours

Cost: 142 hours x \$34.03 = \$4,832

OSHA estimates additional man hours and cost associated with the inspection and application of the date of inspection, four times annually, for the number of chain slings used by the above estimated establishments for tug and towing service. On average, it will take approximately 30 minutes (0.5 hour) for an authorized worker to inspect and affix a label indicating the date of inspection.

Burden hours: 213 slings x 4 inspections/ year x .5 hour = 426 hours

Cost: 426 hours x \$50.62 = \$21,564

OSHA estimates additional man hours and cost associated with the inspection and application of the date of inspection, four times annually, for the number of chain slings used by the above estimated establishments for passenger vessels. On average, it will take approximately 30 minutes (0.5 hour) for an authorized worker to inspect and affix a label indicating the date of inspection.

Burden hours: 42 slings x 4 inspections/year x .5 hour = 84 hours

Cost: 84 hours x \$50.62 = \$4,252

Table 3 --- Summary Burden Hours and Cost in the Shipyard and Non-Shipyard Industries for Sling Inspections

Industry	Affected Establishments	Sling inspections	Time to Inspect	Total Hours	Authorized Employee Wages	Cost
Shipyards	639	10,224	0.5 hours	5,112	\$27.69	\$141,551
Commercial Fishing	1,141	1,520	0.5 hours	760	\$16.29	\$12,380
Fish Processing	214	284	0.5 hours	142	\$34.03	\$4,832
Tug & Towing Services	639	852	0.5 hours	426	\$50.62	\$21,564
Passenger Vessels	126	168	0.5 hours	84	\$50.62	\$4,252
Total	2,759	13,048		6,524		\$184,579

(B) Shackles and Hooks in Shipyards and Non-Shipyards Industries:

Shipyards:

Shackles (paragraph 1915.113 (a)(1)) -- The employer must ensure that shackles have permanently affixed and legible identification markings as prescribed by the manufacturer that indicate the recommended safe working load.

On an average, OSHA estimates that there are 2 shackles per shipyard in use and there are 639 establishments affected in shipyard employment (2 shackles/shipyard x 639 establishments = 1,278 shackles). It is estimated that 1% of the shackles will need to be replaced to have the labels replaced according to the manufacturer’s specifications. It will take 30 minutes (0.5 hours) for a shipyard worker to acquire and affix the label according to manufacturer’s specifications.

Burden hours: 1,278 shackles x 1% shackles to be repaired x .5 hour = 6 hours

Cost: 6 hours x \$22.78 = \$137

Non-Shipyards:

On an average, OSHA estimates that there are half as many shackles used in non-shipyard industries and only one third of the establishments (380) will be affected in Commercial Fishing (1 shackles/shipyard x 380 establishments = 380 shackles). It is estimated that 1% of the shackles will need to be replaced to have the labels replaced according to the manufacturer’s

specifications. It will take 30 minutes (0.5 hours) for a shipyard worker to acquire and affix the label according to manufacturer's specifications.

Burden hours: 380 shackles x 1% shackles to be repaired x .5 hour = 2 hours

Cost: 2 hours x \$16.29 = \$33

On an average, OSHA estimates that there are half as many shackles used in non-shipyard industries and only one third of the establishments (71) will be affected in Fish Processing (1 shackles/shipyard x 71 establishments = 71 shackles). It is estimated that 1% of the shackles will need to be replaced to have the labels replaced according to the manufacturer's specifications. It will take 30 minutes (0.5 hours) for a shipyard worker to acquire and affix the label according to manufacturer's specifications.

Burden hours: 71 shackles x 1% shackles to be repaired x .5 hour = 1 hour (rounded up)

Cost: 1 hour x \$19.37 = \$19

On an average, OSHA estimates that there are half as many shackles used in non-shipyard industries and only one third of the establishments (213) will be affected in Tug & Towing Services (1 shackles/shipyard x 213 establishments = 213 shackles). It is estimated that 1% of the shackles will need to be replaced to have the labels replaced according to the manufacturer's specifications. It will take 30 minutes (0.5 hours) for a shipyard worker to acquire and affix the label according to manufacturer's specifications.

Burden hours: 213 shackles x 1% shackles to be repaired x .5 hour = 1 hour

Cost: 1 hour x \$33.32 = \$33

On an average, OSHA estimates that there are half as many shackles used in non-shipyard industries and only one third of the establishments (42) will be affected in Passenger Vessels (1 shackles/shipyard x 42 establishments = 42 shackles). It is estimated that 1% of the shackles will need to be replaced to have the labels replaced according to the manufacturer's specifications. It will take 30 minutes (0.5 hours) for a shipyard worker to acquire and affix the label according to manufacturer's specifications.

Burden hours: 42 shackles x 1% shackles to be repaired x .5 hour = 1 hour (rounded up)

Cost: 1 hour x \$33.32 = \$33

Shipyards:

Examination and Test of Hooks (paragraph 1915.113(b)(1))

This paragraph specifies that where the manufacturer's recommendations are not followed, employers must test each hook to twice its working load. The employer must prepare a certification record for each test, providing the date the test was performed, the name of the

person who performed the test and an identifier of the hook tested. The certification record must be maintained and disclosed upon request to OSHA.

OSHA estimates that the manufacturer's recommendations will be available and followed for 90% of all the hooks, leaving only 10% of the hooks without manufacturer's recommendations to follow. In those situations, the shipyard will either have to call the manufacturer and get the information or test the hook to obtain the information. OSHA bases this assumption on previous conversations with a representative of the Crosby Group (the largest manufacturer of hooks and other rigging equipment). The Crosby Group confirmed that the manufacturer's recommendations are provided at the time of sale, but a small percentage of the users lose those recommendations and must contact the manufacturer (whose ID is on the hook) to establish the working load of the hook. OSHA assumes that some of the users will choose to test the hook to twice its intended working load rather than call the manufacturer to obtain the information. Therefore, OSHA estimates that it will take about 20 minutes (.33 hour) per hook for a shipyard production worker/competent person to conduct the test to determine the working load and an additional 3 minutes (.05 hour) to develop and maintain the certification record for a total of 23 minutes (.38 hour). If the user elects to obtain the information from the manufacturer instead of performing the test, it will take about 35 minutes per hook to make the necessary phone calls and get the information, according to the Crosby Group. The time, thus, is averaged at 28 minutes (.47 hour). A shipyard production worker will make the phones call or conduct the test.

Burden hours: 639 establishments x 4 hooks/shipyard x 10% x .47 hour = 120 hours

Cost: 120 burden hours x \$27.69 = \$3,323

Non-Shipyards:

Also, OSHA estimates in Commercial Fishing that the manufacturer's recommendations are available to the 90% for all to follow and leaving only 10% of the hooks without manufacturer's recommendations to follow. And on average, only one third of those establishments will have to make the phones call or conduct the test.

Table 4 – Summary of the Burden Hours and Cost for Hooks

Industry	Affected Establishments	Hooks	Percent Repaired	Time to Repair	Total Hours	Affected Employee Wages	Cost
Commercial Fishing	380	1	10%	0.47 hour	18	\$16.29	\$293
Fish Processing	71	1	10%	0.47 hour	3	\$19.37	\$58
Tug & Towing Services	213	1	10%	0.47 hour	10	\$33.32	\$333
Passenger Vessels	42	1	10%	0.47 hour	2	\$33.32	\$67
Total					33		\$751

(C) Hoisting and Hauling Equipment in shipyards

Shipyards:

Mobile crawler or truck cranes used on a vessel (paragraph 1915.115(c)(1)) -- Employers must conspicuously post the maximum manufacturer's rated safe working loads for the various working radii of the boom and the maximum and minimum radii at which the boom may be safely used with and without outriggers. The location of placement must be near the controls and visible to the operator.

On average, OSHA estimates that there is one mobile crawler or truck crane per shipyard, and that this type of equipment would not be used in non-shipyards. Therefore, out of the approximate 2,759 establishments included in the scope of 29 CFR part 1915, only about 100 are in service for the use of ship repair, shipbuilding, shipbreaking, and other related shipyard employment. Further, it is estimated that it will take 15 minutes (0.25 hours) for a shipyard worker to acquire and affix a label indicating the maximum manufacturer's rated safe working loads.

Burden hours: 100 mobile crane x .25 hour = 25 hours

Cost: 25 hours x \$22.78 = \$570

(D) Examination and Test Records of Unfired Pressure Vessels (paragraph 1915.172(d))

As discussed under Item 2, OSHA does not believe that there are any unfired pressure vessels not built to the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section VIII, Rules for Construction of Unfired Pressure Vessels, 1963 currently in use; therefore, there would be no burden hours and costs for this paragraph.

However, for purposes of this ICR, OSHA maintains that each shipyard will have, on average, four portable, unfired pressure vessels (UPVs) and that it will take 13 minutes (.22 hour) for a competent person to conduct the quarterly examination of the vessel and to generate and maintain a certification record of the examination. In addition, OSHA estimates that it will take 18 minutes (.3 hour) per vessel for a competent person to conduct the yearly hydrostatic pressure test of the vessels and to generate and maintain a certification record of the results of the test.

Burden hours: Quarterly: 639 establishments x 4 vessels x 4 tests/year x .22 hour = 2,249 hours

Cost: 2,249 burden hours x \$27.69 = \$62,275

Burden hours: Yearly: 639 establishments x 4 vessels x .3 hour = 767 hours

Cost: 767 burden hours x \$27.69 = \$21,238

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

- The cost estimate should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of service component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondent (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

Item 12 above provides the total cost of the information collection requirements specified by the Standards.

14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

There are no costs to the Federal Government.

15. Explain the reasons for any program changes or adjustments reported.

OSHA is requesting an increase adjustment in the number of burden hours from 3,162 hours to 9,773 hours, a total increase of 6,611 burden hours. In this ICR, the scope of the maritime standards, 29 CFR part 1915 for slings, shackles, and hooks, are based on the Final Economic Analysis for the final rule revising subpart F of 29 CFR part 1915 prepared by OSHA's Office of Regulatory Analysis. The revision of the standard applies to all shipyard employment which is defined in 1915.4(i) as ship repairing, shipbuilding, shipbreaking, and related employment. Also, upon further analysis, the Agency identified two new collections of information contained in the Standard under paragraphs 1915.112(c)(2) and 1915.115(c)(1). See Table 5 for a summary of the burden hours and cost.

16. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection information, completion of report, publication dates, and other actions.

OSHA will not publish the information collected under the Standard.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be appropriate.

No forms are available for the Agency to display the expiration date.

18. Explain each exception to the certification statement.

OSHA is not seeking an exception to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

The supporting statement does not contain any collection of information requirements that employ statistical methods.

**Table – 5
Shipyard Employment Standard Burden Hours and Cost**

	ICR Requirements	Current Burden Hours	Requested Burden Hours	Estimated Cost	Responses	Comments
1	Shipyards – Slings to be repaired					
2	§1915.112(a)(1) Manila rope and manila rope slings	13	13	\$296	26	
3	§1915.112(b)(1) Wire rope and wire rope slings	13	13	\$296	26	
4	§1915.112(c)(1) Chain and chain slings	13	13	\$296	26	
5	Non-Shipyards – Slings to be repaired					
6	Commercial Fishing	n/a	2	\$33	4	
7	Fish Processing	n/a	1	\$19	1	
8	Tug & Towing Services	n/a	1	\$33	2	
9	Passenger Vessels	n/a	1	\$33	1	
10	Shipyards and Non-Shipyards – Sling inspections					
11	§1915.112(c)(2) Chain and chain –Shipyards	n/a	5,112	\$141,551	10,224	
12	Commercial Fishing	n/a	760	\$12,380	1,520	
13	Fish Processing	n/a	142	\$4,832	284	
14	Tug & Towing Services	n/a	426	\$21,564	852	
15	Passenger Vessels	n/a	84	\$4,252	168	
16	Shipyards – Shackles					
17	§1915.113(a)(1) Shackles	6	6	\$137	13	
18	Non-Shipyards – Shackles					
19	Commercial Fishing	n/a	2	\$33	4	
20	Fish Processing	n/a	1	\$19	1	
21	Tug & Towing Services	n/a	1	\$33	2	
22	Passenger Vessels	n/a	1	\$33	1	
23	Shipyards – Hooks					
24	§1915.113(b)(1) Examination and test of hooks	119	120	\$3,323	256	
25	Non-Shipyards – Hooks					

		ICR Requirements	Current Burden Hours	Requested Burden Hours	Estimated Cost	Responses	Comments
26		Commercial Fishing	n/a	18	\$58	38	
27		Fish Processing	n/a	3	\$333	7	
28		Tug & Towing Services	n/a	10	\$67	21	
29		Passenger Vessels	n/a	2	\$751	4	
30	Shipyards						
31		Mobile crawler or truck cranes used on a vessel (paragraph 1915.115(c)(1))	n/a	25	\$570	100	
32		§1915.172(d) Examination and test records of unfired pressure vessels. (quarterly)	2,235	2,249	\$62,275	10,224	
33		§1915.172 Examination and test records of unfired pressure vessels (yearly)	762	767	\$21,238	2,556	
34	All Industries						
35		§1915 Disclosure of certification records	1	n/a	\$0	0	
36		Total	3,162	9,773	\$274,455	23,805	

All numbers in the chart have been rounded up to the nearest whole number.